



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EMN:AH/SPN/PT/MKM

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 19, 2016

By Hand and ECF

The Honorable Raymond J. Dearie  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Zorana Danis  
United States v. Alfredo Hawit et al.  
United States v. Fabio Tordin  
United States v. Luis Bedoya  
United States v. Roger Huguet  
United States v. Miguel Trujillo  
Criminal Docket Nos. 15-240 (RJD), 15-252 (RJD),  
15-240 (RJD), 15-564 (RJD), 15-569, (RJD), 15-585 (RJD),  
16-108 (RJD)

Dear Judge Dearie:

The government respectfully submits this letter in response to the letter motion of counsel for BuzzFeed News on June 23, 2016 seeking to unseal the transcripts of the guilty pleas entered by defendants Zorana Danis, Fabio Tordin, Luis Bedoya, Roger Huguet, Rafael Callejas, Alfredo Hawit, and Miguel Trujillo in the above-listed cases, and to require the public filing of these defendants' plea agreements. The transcripts of some of these defendants' guilty plea proceedings were never sealed (in the cases of Trujillo, Callejas and Hawit), so the government does not object to a motion for their unsealing. The government also does not object to the unsealing of the transcripts of Danis, Tordin, Bedoya, and Huguet's guilty plea proceedings, with limited redactions that the government has proposed to the Court, for reasons set forth in a separate submission filed yesterday under seal. The government opposes the public filing of these defendants' plea agreements, also for reasons

set forth in the same sealed submission. The government has conferred with counsel for all of these defendants, and they join in this request.

Respectfully submitted,

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